

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

TYROME WILLIAM LOTT, SR.,

Plaintiff,

v.

Civil Action No. 3:14cv45

MCH TRANSPORTATION CO., et al.

Defendants.

DEFENDANTS' RULE 26(a)(3) PRETRIAL DISCLOSURES

COME NOW MCH Transportation Co. and Hersie Tyson, Jr., by counsel, counsel and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, make the following disclosures of information regarding witnesses and exhibits that may be used to support defenses to plaintiff's claims in the above-captioned action.

I. WITNESSES

Expected to testify:

Hersie Tyson
Dale Nuccum
Trooper T. Cashin
Tyrome Lott
Gerrick Bailey
Stanley Rudisill
Lorenzo Jackson
Mark Ross, MD
H. Gray Broughton

Although not anticipated, defendants reserve the right to call any treating medical care provider as appropriate or may be necessary based upon the evidence at trial:

Therese Duane, MD
Lindsay Hickerson, MD
Jonathan Isaacs, MD
Wilhelm Zuezer, MD
Ajit Pai, MD
Jay Granier, MD

Michael Dardozzi, MS
James Magee
Thomas Campbell, PhD
Cynthia Iskow
Kenshia Thornton, LSW
Paulette Beasley
Jessica Pack
Shradha Sanghui
Alison Conley
Wilda Jones

II. EXHIBITS

In accordance with Rule 26(a)(3) of the Federal Rules of Civil Procedure, these defendants, by counsel, state that they will or may use the following exhibits:

1. Photographs of MCH Transportation Vehicle
2. Photographs of Lott Motorcycle
3. Photographs of Bailey Motorcycle
4. Photographs of Accident Scene
5. Photographs of Tire and Rim
6. Police Statement of H. Tyson
7. Diagrams and maps of scene
8. Vehicle Inspection Reports
9. Photographs of Individuals at scene
10. Deposition of Plaintiff

This defendant reserves the right to supplement this listing as appropriate.

MCH TRANSPORTATION CO. and HERSIE
TYSON, Jr.

/s/
James A. Cales III, Esquire
Virginia State Bar No. 41317

Counsel for Defendants
Furniss, Davis, Rashkind and Saunders, P.C.
6160 Kempsville Circle, Suite 341B
Post Office Box 12525
Norfolk, Virginia 23541-0525
Telephone No. (757) 461-7100
Facsimile No. (757) 461-0083
E-mail: jcales@furnissdavis.com

James A. Cales III, Esquire
Virginia State Bar No. 41317
Jonathan R. Hyslop, Esquire
Virginia State Bar No. 78618
Furniss, Davis, Rashkind and Saunders, P.C.
6160 Kempsville Circle, Suite 341B
Post Office Box 12525
Norfolk, Virginia 23541-0525
Telephone No. (757) 461-7100
Facsimile No. (757) 461-0083

CERTIFICATE

I hereby certify that on the 14th day of October, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

Joseph S. Massie III, Esquire
Massie Law Firm, PC
102 E. Cary Street
Richmond, Virginia 23219
jmassie@massielawfirm.com

Michael J. Massie, Esquire
Massie Law Group
4406 West Norfolk Road, Suite D
Portsmouth, Virginia 23703
massielawgroup@gmail.com

Counsel for Plaintiff

/s/
James A. Cales III, Esquire
Virginia State Bar No. 41317
Counsel for Defendants

Furniss, Davis, Rashkind and Saunders, P.C.
6160 Kempsville Circle, Suite 341B
Post Office Box 12525
Norfolk, Virginia 23541-0525
Telephone No. (757) 461-7100
Facsimile No. (757) 461-0083
E-mail: jcales@furnissdavis.com